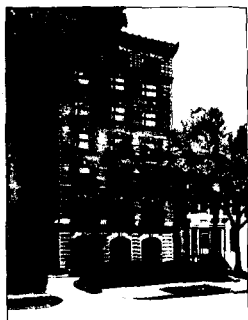


**naeyc**

## NATIONAL ASSOCIATION for the EDUCATION of YOUNG CHILDREN

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Bea Romer

April 23, 1993

To: Members of the Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Re: Comments submitted by the National Association for the  
Education of Young Children on policies and rules concerning  
children's television programming, MM Docket No. 93-48

As the nation's largest organization working on behalf of young children, with more than 85,000 members, the National Association for the Education of Young Children applauds the FCC for seeking comments as to how its rules and policies might be revised to more clearly identify the levels and types of programming needed to adequately serve the educational and informational needs of children. Because NAEYC's mission addresses the early childhood years from birth through age 8, our comments are focused on that age range.

NAEYC strongly supports the Commission's decision to require some "core" consisting of *standard-length* programming *explicitly* designed to serve the educational and informational needs of children in order for licensees to fulfill their obligations under the Children's

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These distinct age groups (or finer differentiations if possible) should be reflected in the development and review of licensees' statements of purpose as well as any FCC-developed guidance materials or standards related to meeting the obligations under CTA.

While we would support the development of specific guidance standards, we believe that other evidence should also be considered in reviewing how stations are fulfilling their obligations under CTA. We strongly support the concepts to which the inquiry refers, namely

- regularly-scheduled
- standard length programming
- *explicitly* designed to serve as an educational or informational purpose with entertainment as a secondary function, not vice versa.

NAEYC supports the adoption of staff processing guidelines that stipulate a baseline for "core" programming. Given diversity of needs of different viewers, careful consideration is necessary. For example, 1/2 hour for toddlers does little to meet teen needs. Meeting each group's needs with 1 hour per week leaves 20 minutes per week for each of 3 age groups—an outcome not in keeping with the concept of regularly scheduled, full-length programming. In keeping with the concept of a regularly scheduled, standard-length core, we would suggest a minimum baseline of 2-1/2 hours per week (1/2 hour per weekday and one hour during the weekend). Ideally, we believe that a minimum of 1/2 hour per day of a regularly scheduled program with an explicitly educational or informational purpose should be available for preschool viewers; similarly 1/2 hour per day (scheduled after regular school hours) should also be available both for elementary viewers and teen viewers.

In addition, we suggest that the criteria might include evidence of systematic input from parents, early childhood teachers and other service providers, public school teachers and administrators, pediatricians, youth service organizations, and other agencies or organizations concerned with children's and family issues. Examples of such evidence include an advisory panel or focus groups to provide community input and guidance or active community involvement with children's services and projects.

In addition to considering the different age-related educational and informational needs of children, we believe that adequately serving these needs requires attention to specific circumstances and contexts of children's lives. For example, in the two weeks preceding the submission of these comments, television newscasts were dominated by stories of a random killer stalking the streets of

a prison siege in Ohio. Certainly, we believe television stations are obligated to fully report each of these violent stories. But, we must also realize the effects of such violence on children and to provide specific opportunities to counter the violence.

While the CTA was not specifically designed to address media violence, we cannot help but note that violence—whether on the news—or the gratuitous violence that is so prevalent in many children's programs *undermines* efforts to serve children's educational and informational needs. Any time that is specifically devoted to serving children's educational and informational needs is that much time that is *not* devoted to violence. The research on the deleterious effects of media violence (see NAEYC position statement on media violence, attached) is clear. If we are to truly address the educational and informational needs of children, we must help them deal with the violence in their lives and also reduce it. Perhaps the easiest violence to deal with is the gratuitous violence so prevalent in cartoons primarily geared toward child audiences.

The Commission's inquiry also sought comments regarding a shortage of appropriate programming for children. NAEYC supports full funding of measures